



June 14, 2024

Sophie Shulman
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Docket No. NHTSA-2024-0012

Dear Honorable Shulman,

The American Association for Laboratory Accreditation (A2LA) appreciates the opportunity to respond to this notice of proposed rulemaking from the National Highway Traffic Safety Administration (NHTSA).

A2LA is a non-profit accreditation body with over 4300 actively accredited organizations in all 50 states and an international presence. We have been providing accreditation services to testing laboratories for forty-five years. We currently have 148 testing laboratories accredited to perform Federal Motor Vehicle Safety Standards (FMVSS). The criteria forming the basis for our laboratory accreditation program is ISO/IEC 17025 [General requirements for the competence of testing and calibration laboratories](#). We were evaluated against rigorous standards in providing this accreditation service and are recognized internationally as an International Laboratory Accreditation Cooperation (ILAC)-recognized accreditation body.

We appreciate the proposed rule's objectives to update FMVSS No. 305 to No. 305a. We support the agency's goal of harmonizing the standards between the US FMVSS 305a and the Global Technical Regulation (GTR) No. 20 but believe that tighter harmonization can be achieved. We recommend that the NHTSA consider adopting conformity assessment activities as part of the rule.

Examples of conformity assessment may include requiring manufacturers to utilize ISO/IEC 17025 accredited testing laboratories, ISO/IEC 17020 accredited inspection bodies, and/or ISO/IEC 17065 product certification bodies. This model would allow manufacturer's laboratories and private sector commercial testing laboratories to demonstrate and achieve accreditation, through an ILAC recognized accreditation body, for the FMVSS identified on their Scope of Accreditation.

The automotive industry is adopting new technological advancements at an ever-increasing frequency. These advancing opportunities are accompanied by a level of risk. By utilizing a conformity assessment approach, you will be inherently including risk assessments within the management system requirements that are integral to the laboratory processes.

Relying on conformity assessment when it comes to integrating the new technological advancements, such as FMVSS 305a, while continuing to also utilize the self-certification model that has been serving the industry well for decades, NHTSA will be ensuring that additional layers of safety and risk mitigation are being added.

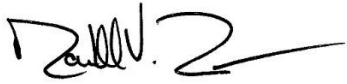
Accredited conformity assessment demonstrates:

- The use of the appropriate methods and procedures,
- an added layer of quality/oversite,
- Technically competent personnel,
- Use of the maintained and calibrated equipment and appropriate facilities; and
- Supportive management system based on risk assessment and continuous improvement.

By adopting a conformity assessment model this harmonization may further facilitate global trade through the acceptance of testing data over international borders and increase consumer confidence in the safety of these new innovations.

We thank you for the opportunity to provide comments and if you have any further questions about accreditation, you are welcome to contact me directly at rquery@A2LA.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Randall Query", with a long horizontal flourish extending to the right.

Randall Query, Director of Government Relations, A2LA